



U.S. Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section

450 5th St., N.W., Fifth Floor
Washington, D.C. 20530

VIA ECF

Hon. Michael A. Hammer
United States Magistrate Judge
District of New Jersey
Dr. Martin Luther King Jr. Bldg. & U.S. Courthouse
50 Walnut Street, Courtroom MLK 2C
Newark, NJ 07102

January 13, 2025

Re: *The Roman Catholic Diocese of Paterson, N.J., et al. v. U.S. Department of State, et al.*, No. 2:24-cv-8350

Dear Judge Hammer:

On December 31, 2024, the Court granted Plaintiffs' unopposed motion for a stay and issued a continued stay in the above-referenced matter until March 31, 2025. ECF 26. In granting the stay, the Order noted that “[i]t appears that the parties are actively negotiating a resolution of this matter that would moot the claims in the Complaint, but that it requires coordination among multiple federal agencies.” *Id.* The parties wish to clarify that they are not actively negotiating a resolution at this time. Rather, Plaintiffs have informed Defendants that they are seeking a non-litigation resolution of this case through their direct discussions with Congressional members’ offices. As previously stated, the Defendants do not oppose the continued stay of this matter while Plaintiffs pursue this potential non-litigation resolution.

Respectfully submitted,

NORRIS McLAUGHLIN, P.A.

/s/ Raymond G. Lahoud
Raymond G. Lahoud, Esquire*
515 West Hamilton Street
Suite 502
Allentown, PA 18101
Phone: (484) 544-0022
e-mail: rglahoud@norris-law.com

*Pro Hac Vice

Counsel for Plaintiffs

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

GLENN M. GIRDHARRY
Assistant Director

/s/ Alexandra McTague
Alexandra McTague
Trial Attorney
United States Department of Justice
Civil Division
Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
Phone: (202) 718-0483
e-Mail: alexandra.mctague2@usdoj.gov
Counsel for Defendants